

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP
ONE MANHATTAN WEST
NEW YORK, NY 10001

TEL: (212) 735-3000

FAX: (212) 735-2000

WWW.SKADDEN.COM

DIRECT DIAL
212-735-2995
DIRECT FAX
917-777-2995
EMAIL ADDRESS
JOCELYN.STRAUBER@SKADDEN.COM

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BY ECF

The Honorable Valerie E. Caproni
United States District Judge
U.S. District Court
Southern District of New York
40 Foley Square
New York, NY 10007

MEMO ENDORSED

Re: *United States v. Velez*, 19 Cr. 862 (Deeshuntee Stevens)

Dear Judge Caproni:

I write on behalf of my client, Deeshuntee Stevens, to respectfully request permission for Mr. Stevens to travel from Rochester, NY, to New York City, from December 24, 2020 to December 25, 2020, to visit his daughters on Christmas Eve and Christmas Day. Mr. Stevens' daughters reside in the East Bronx with their mother, Melissa Blondet, one of the co-signors for Mr. Stevens' bond. If granted permission, Mr. Stevens will travel by bus to and from New York City, leaving Rochester in the morning of December 24, and returning in the early morning hours of December 26. He will spend the night of December 24 at a motor inn near Ms. Blondet's residence. If the Court is not inclined to permit Mr. Stevens to spend the night in New York City, he could instead travel to New York City in the early morning hours of December 25, departing in the early morning hours of December 26.

Mr. Stevens plans to celebrate Christmas at Ms. Blondet's residence. In addition to Mr. Stevens, there will be five attendees at the gathering, all of whom

Hon. Valerie E. Caproni
December 21, 2020
Page 2

reside in the same household: Mr. Stevens' two daughters, who are thirteen and eight years old; Ms. Blondet, with whom Mr. Stevens maintains a close relationship; and Ms. Blondet's two other children, an eighteen-year-old daughter and a one-year-old son. The gathering at Ms. Blondet's home is consistent with New York State's rules with respect to gatherings at private residences because only six people will be present.¹

The United States Attorney's Office and the office of Pretrial Services oppose this request.

As the Court is aware, on October 7, 2020, your Honor granted Mr. Stevens' request to travel to New York City on the occasion of his daughter's thirteenth birthday, with the consent of the government. Mr. Stevens' trip was without incident. In addition, Mr. Stevens has since obtained employment in Rochester, and he is adapting well to supervision. Mr. Stevens also sought permission to travel to New York City to spend Thanksgiving day with his daughters, and to attend a gathering at which Ms. Blondet's household, and another household, would be present. The government opposed that request, and your Honor denied that request on November 24, 2020.

As the Court is also aware, on August 21, 2020, your Honor ordered Mr. Stevens released on bail, with the consent of the government, on conditions including: (1) a \$100,000 personal recognizance bond, signed by Mr. Stevens and co-signed by three financially responsible persons; (2) home detention with electronic monitoring, except to attend work, to seek employment (with agreement of the office of Pretrial Services as to the specifics), and for medical visits and legal visits, at the Rochester, New York home of Jesseivett Orta, a close family friend serving as third-party custodian; and (3) travel restricted to the state of New York. Mr. Stevens is charged in the above-referenced matter with conspiracy to distribute heroin, fentanyl and other narcotics, in violation of 21 U.S.C. §§ 841(a)(1), 846, and possession of a firearm during and in relation to a drug trafficking offense, in violation of 18 U.S.C. §§ 924(c), 2.

¹ See New York State, *Novel Coronavirus: What You Need to Know*, <https://coronavirus.health.ny.gov/home> (last updated Dec. 20, 2020, 3:55 PM) ("Indoor and outdoor gatherings at private residences are limited to no more than 10 people.").

Hon. Valerie E. Caproni
December 21, 2020
Page 3

Respectfully submitted,

s/ Jocelyn E. Strauber

cc: Assistant U.S. Attorney Adam S. Hobson
Assistant U.S. Attorney Elinor L. Tarlow
U.S. Pretrial Services Officer Jonathan Lettieri
U.S. Pretrial Services Officer Jeremy Bedette

Mr. Stevens' request to travel is hereby denied. Like with Mr. Stevens' request to travel over Thanksgiving, the Court is sympathetic to Mr. Stevens' desire to spend Christmas with his family. But the ongoing COVID-19 pandemic played a central role in the Court's decision to grant Mr. Stevens' pretrial release on home detention. The Court recognizes that unlike with his Thanksgiving travel request, this request is to visit with individuals from one household. But Mr. Stevens himself comes from a different household and so any event would include the mixing of two households in violation of CDC guidelines. Additionally, the round trip between Rochester and New York City may not be safe for Mr. Stevens or for any individuals with whom he may come into contact.

The Clerk of Court is respectfully directed to close the open motion at docket entry 297.

SO ORDERED.



Date: December 21, 2020

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE